

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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August 16, 2022


Via ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

REQUEST GRANTED.

The time for Ms. Borges to satisfy the conditions of her pretrial release is extended to August 31, 2022.

8/17/2022 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Re: United States v. Raquel Moura Borges
21 Cr. 172 (LJL)

Dear Judge Liman,

We write with the consent of the government to respectfully request a two-week extension of the August 17, 2022 deadline for Ms. Borges to satisfy the conditions of her pretrial release in this matter. Among other conditions, Ms. Borges was ordered to secure her \$5 million personal recognizance bond with a co-operative property (including by filing a confession of judgment with New York State) and to have two financially responsible persons co-sign her bond. Ms. Borges and our office have been working diligently and cooperatively with the government on promptly satisfying these conditions, which have taken longer than anticipated to complete. In the interim, Ms. Borges remains subject to location monitoring and travel restrictions (with which she has been fully compliant), and her travel documents remain in the custody of Pretrial Services. The additional two weeks requested herein will allow Ms. Borges and the defense to satisfy the remaining conditions of Mr. Borges's pretrial release.

Accordingly, we respectfully request that Ms. Borges be permitted until August 31, 2022 to satisfy the conditions of her pretrial release. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Neil P. Kelly
Assistant Federal Defender
(212) 417-8744

cc: AUSA Gina Castellano